

Presko, S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Fairfield Sentry Limited (In Official)
Liquidation), Fairfield Sigma Limited (In)
Official Liquidation), and Fairfield Lambda)
Limited (In Official Liquidation) acting by)
and through The Foreign Representatives)
thereof,)
Plaintiffs,)
-against-)
SNS Global Custody and Beneficial Owners)
of Accounts Held in the Name of SNS Global)
Custody 1-1000,)
Defendants.)

USDC SDNY
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DATE FILED: 10/29/10

No. 10-CV-7529 (LAP)

STIPULATION AND ORDER ON BRIEFING

WHEREAS, on October 1, 2010, Defendant SNS Global Custody B.V. ("SNS") filed a motion for (1) withdrawal of the reference and (2) remand or abstention in the above-captioned action.

WHEREAS numerous defendants in similar actions pending in the United States District Court for the Southern District of New York filed motions to withdraw the reference to the United States Bankruptcy Court, and certain of those defendants also moved for remand and/or abstention (collectively, the "Motions");

WHEREAS Plaintiffs intend to submit two omnibus briefs responding to such Motions, including one omnibus brief in opposition to the motions to withdraw the reference and one omnibus brief in opposition to the motions to remand and/or abstain.

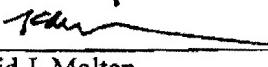
IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs Fairfield Sentry Limited, Fairfield Sigma Limited, and Fairfield Lambda Limited, by and through their

Foreign Representatives (collectively, "Plaintiffs"), and Defendant SNS (together with Plaintiffs, the "Parties"), subject to approval by the Court, as follows:

1. Each of the two omnibus briefs filed in opposition to the Motions shall not exceed twenty five (25) pages in length. SNS expressly reserves all rights with respect to Plaintiffs' intention to file separate briefs on the withdrawal and remand/abstention issues.
2. SNS may file a single reply brief that shall not exceed twenty five (25) pages in length.
3. This stipulation is without prejudice to any other rights of the Parties, and the Parties do not waive, and expressly reserve, all other rights, claims, and defenses, including without limitation any defenses that SNS may have based on adequacy of service, subject matter jurisdiction, and personal jurisdiction.

Dated: New York, New York
October 27, 2010

BROWN RUDNICK LLP

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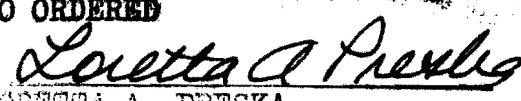
*Counsel for Plaintiffs Fairfield Sentry Limited (In Official Liquidation),
Fairfield Sigma Limited (In Official Liquidation) and Fairfield Lambda Limited (In Official Liquidation), acting by and through their Foreign Representatives*

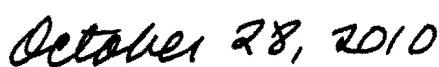
WILMER CUTLER PICKERING HALE AND DORR LLP

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Counsel for Defendant SNS Global Custody B.V.

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE


October 28, 2010